

DISCOVERY BY DEBTOR TO MOVANT

- Interrogatory 1:* Name all witnesses you intend to call at the hearing. Designate which are expert witnesses. Provide a brief statement of the substance of the testimony of the witnesses. Provide a copy of any written expression of opinion as to value of any property for which the stay is sought to be lifted.
- Interrogatory 2:* State the total amount claimed by the creditor to be owed by the debtor, including a breakdown of principal, interest, other charges and the per diem interest.
- Interrogatory 3:* State the security interest claimed by the creditor in the subject property.
- Interrogatory 4:* State the value of the collateral for which this stay is sought to be lifted. State the grounds on which this evaluation is based.
- Interrogatory 5:* State all reasons why movant believes that its interest in the collateral is not adequately protected.